

Dover GAS LIGHT OIL
3. REMEDIAL RESPONSE PLANNING

22936

*Rec'd
10/7/92
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October 5, 1992

ENGINEERING
PLANNING
MANAGEMENTEd Dunlap
Chesapeake Utilities Corporation
350 South Queen Street
Dover, Delaware 19901

Dear Ed,

This letter is to inform you of the status of the waste management activities related to the Phase II Ground-Water Evaluation Study field work. A total of forty-seven 55-gallon drums of potentially hazardous waste were generated during the drilling operations and related decontamination activities.

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Of these forty-seven drums, three drums of Personal Protection Equipment (PPE) and Disposable Equipment (DE) were generated. No analyses are required for disposal of these materials. Trash will be double bagged in plastic trash bags by George and Lynch, and disposed of in an industrial dumpster as per EPA guidance (OSWER Directive 9345.3-02).

SUITE 230

The forty-four drums were individually sampled and tested for RCRA characteristics, including ignitability, corrosivity, and reactivity. If the drums possessed two phases (solid and liquid) each phase was sampled and tested independently. None of the drums would be classified as hazardous under RCRA, based on the characteristics tests. Samples from each of the drums were also analyzed for classification by DOT hazard class. Seventeen of the drums were classified as "oxidizing liquids or oxidizing solids", based on the DOT criteria. Vapors trapped in the drums were also screened with an Hnu organic vapor monitor, to provide additional information.

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FAX 703/849-0065

A variety of physical and chemical characteristics were evaluated to identify the appropriate disposal options for the drummed materials including vapor screening results, DOT and RCRA classifications, field observations, and comparing soil and water analytical data to UST clean up standards, MCLs, and TCLP limits. Drummed materials were grouped into four categories for composite sampling: non-hazardous liquids, non-hazardous solids, potentially hazardous liquids, and potentially hazardous solids. In this instance, "hazardous" is defined as material which cannot be disposed of in the Central Solid Waste Management Facility, in Sandtown, Delaware. The attached table presents a list of the drums and their groupings.

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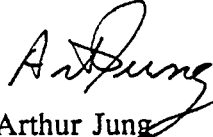
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A separate composite sample for each of the four classes of materials is being tested to determine the ultimate disposition of the drums. Non-hazardous liquids have been tested for total benzene, toluene, ethylbenzene, and xylene (BTEX) and total petroleum hydrocarbons (TPH) as required by the Kent County Engineer's office for discharge in the sanitary sewer system. Greg Jackson, of the Kent County Engineer's Office has reviewed the results and authorized the disposal of the non-hazardous water into the sanitary sewer system. Non-hazardous solids are being tested for full TCLP parameters, total BTEX, TPH, and PCBs, as required by the Delaware Solid Waste Authority for disposal in the Central Solid Waste Management Facility, in Sandtown, Delaware. Potentially hazardous liquids are being tested for non-CLP VOAs, semi-volatiles, and metals as required by Laidlaw Environmental Services for potential disposal by incineration in the Roebuck, South Carolina facility (EPA ID # SCD003360393). Potentially hazardous soils will be tested for the same parameters as the non-hazardous soils (full TCLP, BTEX, TPH, and PCBs/pesticides) for potential disposal at the GSX hazardous waste landfill in Pinewood, South Carolina (EPA ID # SCD070375985).

The waste disposal procedures described above are essentially identical to those that were proposed, approved, and implemented during the 1991 field season. Proposed disposal procedures are contingent on the results of the analyses and will be performed following receipt of DNREC/EPA's authorization for waste disposal in each of the proposed states. Please provide written authorization, as was provided last year, to facilitate the disposal of these materials in South Carolina and Delaware in a timely manner. If you have any questions, please contact me at (703) 204-6349 or Bill DiGuseppi at (703) 204-6346.

Sincerely,


Arthur Jung
Senior Associate

Attachment

cc: Steve Johnson, DNREC
~~Randy Sturgeon, EPA Region III~~
Val DeRocili, George & Lynch

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| Drum Number | Source Location | Screening Sample Number | Potentially Hazardous? | Composite |
|-------------|-----------------|-------------------------|------------------------|-----------|
| 40 | 4 | L026T/S018B | | A/B |
| 42 | 4 | L027T/S019B | | A/B |
| 43 | 4 | L028 | | A |
| 44 | 4 | L029T/S020B | | A/B |
| 45 | 3 | L030T/S021B | | A/B |
| 46 | 3 | L031 | | A |
| 47 | 3 | S022 | | B |
| 48 | Trash | S023 | | E |
| 61 | 1 | S001 | Y | D |
| 62 | 1 | L001 | Y | C |
| 63 | 1 | S002 | Y | D |
| 64 | 2 | S003 | | B |
| 65 | 1 | L002 | Y | C |
| 66 | 1 | L003T/S004B | Y | C/D |
| 67 | 1 | S005 | Y | D |
| 68 | 2 | S006 | | B |
| 69 | 2 | L004 | | A |
| 70 | 1 | L005 | Y | C |
| 71 | 1 | L006T/S007B | Y | C/D |
| 72 | 1 | L007 | Y | C |
| 73 | 7 | S008 | | B |
| 74 | 7 | L008 | | A |
| 75 | 1 | L009 | Y | C |
| 76 | 5 | S009 | Y | D |
| 77 | 6 | S010 | | B |
| 78 | 5 | L010 | Y | C |
| 79 | 5 | L011 | Y | C |
| 80 | 6 | L012 | | A |
| 81 | 6 | S011 | | B |
| 82 | 6 | L013 | | A |

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| | | | | |
|----|-------|-------------|--|-----|
| 83 | 6 | L014 | | A |
| 84 | 9 | L015 | | A |
| 85 | 9 | L016T/S012B | | A/B |
| 86 | 6 | S013 | | B |
| 87 | 6 | L017 | | A |
| 88 | 4 | L018 | | A |
| 89 | 4 | S014 | | B |
| 90 | 4 | L019T/S015B | | A/B |
| 91 | 9 | S016 | | B |
| 92 | Decon | L020 | | A |
| 93 | Decon | L021 | | A |
| 94 | Decon | L022 | | A |
| 95 | Trash | S017 | | E |
| 96 | Decon | L023 | | A |
| 97 | Decon | L024 | | A |
| 98 | Decon | L025 | | A |
| 99 | Trash | S024 | | E |

A - Non-hazardous Liquids.
 B - Non-hazardous Solids.
 C - Potentially Hazardous Liquids.
 D - Potentially Hazardous Solids.
 E - Trash (No analytical necessary).

The composite for non-hazardous liquids (A) will have the following analyses run:

BTEX
 TPH

The composite for potentially hazardous liquids (C) will have the following (non-CLP) analyses run:

VOAs
 BNAs
 ICP metals

Composites for non-hazardous and potentially hazardous solids will have the following analyses run:

Full TCLP (including matrix spike)
 BTEX
 TPH
 PCBs/Pesticides

The three drums of trash will be double bagged in plastic and disposed of in an industrial dumpster.

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